

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

September 22, 2011

Christopher S. Alger, Project Manager Iris Environmental 1438 Webster Street, Suite 302 Oakland, California 94612

Re:

RFI Workplan

Consent Order, Docket No. RCRA(A)-09-2008-03 & First Amendment, Docket No. RCRA-3008-09-2008-0003

Dear Mr. Alger:

In keeping with the above referenced Administrative Order on Consent (Order) and the Romic Environmental Technologies Corp. letter of Jan. 21, 2008 I am directing that Romic develop and submit a RCRA Facility Investigation (RFI) Workplan by December 4, 2011. In keeping with paragraph 34 of the initial Order the RFI should focus upon the nature and extent of any releases of hazardous waste and/or hazardous constituents at or from the facility which may pose an unacceptable risk to human health and the environment. Specific guidance is provided in paragraphs 35, 36, 37 and 38 of the Order. The scope of the Workplan should be based upon the Conceptual Site Model dated February 3, 2011, Romic's RFI Proposal of August 12, 2011 and subsequent written and verbal guidance from US EPA. One significant change from the RFI Proposal is the installation of an additional monitoring well at the distal end of the identified plume to measure plume movement over time. Additionally, the comments from the Gila River Indian Community Department of Environmental Quality (GRIC DEQ) letter of August 29, 2011 should be addressed in the Workplan (enclosed).

Romic is encouraged to consult and share drafts with US EPA as it develops the Workplan.

If you have any comments or questions concerning this letter please contact me (415) 972-3346.

Sincerely,

John R. Moody

Project Manager

1 encl.

cc:

R. Sugerman (EPA, ORC)

